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August 15, 2005

Mr. Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave., S.W.
Room 4008-So., Ag Stop 0268
Washington, DC 20250

Re: Docket No. TM-04-07, Submission of Comments in Response to ANPRM Concerning NOP Sunset Review

Dear Mr. Neal:

Valley Research, inc. herein submits its response to the Advance Notice of Proposed Rulemaking requesting comments regarding the allowed use of synthetic and non-synthetic substances in organic production and handling, which shall expire on October 21, 2007, as required by the Organic Foods Production Act of 1990, Cf. 70 Fed. Reg. 35,177 (June 17, 2005). Valley Research, inc. believes that the continued allowance of the enzymes identified for use in “organic products” in the National List of Allowed and Prohibited Substances is appropriate.

As a member of the Enzyme Technical Association (ETA) and a company that sells a range of enzymes for use in organically labeled foods, Valley Research fully and completely supports the comments provided by the ETA and submitted to you under separate cover with a copy attached to this letter.

In summary, enzymes do not have an adverse impact either on humans or on the environment; enzymes are essential for organic production; and enzymes are compatible with organic production practices. For these reasons, as discussed in the ETA submission, the Secretary of Agriculture should renew the exemption for enzymes provided in 7 CFR § 205.605(a). Enzymes are critical to the handling and production of a variety of organic agricultural products and the expiration of their exempt status would disrupt well-established and accepted organic production and handling practices. Valley Research, inc. therefore seeks the continued exemption of enzymes as nonsynthetic substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic”.

Sincerely,

Art Sears
President

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